

**LAGOMARSINO LAW**

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*Attorneys for Plaintiff***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

JUSTYN HORNOR, individually,

Plaintiff,

vs.

BRANDON WEY, individually; REFLEX  
MEDIA, INC, a Nevada Corporation; ROE  
ENTITIES I – V, inclusive,

Defendants.

CASE NO.: 2:22-cv-01840-RFB-DJA

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES****(EIGHTH REQUEST)**

AND ALL RELATED CLAIMS.

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned attorneys that the discovery cut-off date of March 7, 2025, be continued for a period of sixty (60) days from the Court's prior Order (ECF No. 81), up to and including **May 6, 2025**, for the purpose of allowing the parties to complete written discovery, complete the depositions of the remaining parties, experts, and lay witnesses, and any other discovery the parties wish to conduct.

**I. DISCOVERY COMPLETED TO DATE**

- Plaintiff and Defendants have engaged in a significant amount of written discovery requests, the most recent of which was Defendant Reflex Media, Inc.'s responses to Plaintiff Justyn Hornor's Requests for Production of Documents served on January 13, 2025.
- Plaintiff has conducted several depositions, including those of Heather Pressley, Wade Jones, Ulysses Diaz, Ruben Buell, Lord Michael Bautista, Latasha Davis, Marc Hall, Christopher Kagay, Eric Smith, Ph.D., Mark Smith, Esq., Brandon Wey, Joe Ruben Buell, and Reflex Media, Inc. 30(b)(6).
- Defendants has conducted several depositions, including those of Justyn Hornor, Vance M. Washington, M.D., Tara Hornor, and LTC Holifield.
- The Parties have sent subpoenas to several third-party witnesses for documentation.

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**II. DISCOVERY YET TO BE COMPLETED**

The Parties have yet to complete the following discovery:

- limited depositions of fact witnesses, if any;
- subpoenas *duces tecum* and the depositions of third-party percipient witnesses;
- expert witness depositions;
- additional written discovery which may include written discovery to one another and/or additional subpoenas to third parties; and
- any additional discovery the parties wish to conduct.

The Parties reserve the right to conduct additional discovery that is permitted by the Federal Rules of Civil Procedure.

**III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

The parties have diligently engaged in discovery and done what they can to move the case forward. The deadline to disclose expert rebuttal witnesses in this case was on Monday, February 3, 2025. Plaintiff disclosed three rebuttal witness reports, and Defendant disclosed seven. Including those disclosed in Initial Expert Disclosures, there are fifteen (15) individual expert witnesses disclosed between the Parties. Counsel for the Parties intends to identify which of the experts they intend to depose and attempt to come to an agreement on it before looking to motion practice. Regardless, however, the Parties need more time than is currently allotted to complete expert depositions. As such, the parties request, in good faith, that the present discovery deadlines be extended by sixty (60) days.

**IV. PROPOSED EXTENDED DEADLINES**

	<u>Current</u>	<u>Proposed</u>
Discovery cut-off	3/7/2025	5/6/2025
Deadline to file dispositive motions	4/7/2025	6/6/2025
Deadline to file pre-trial order	5/5/2025	7/7/2025 <sup>1</sup> or 30 days after the dispositive motions have been decided.
...		

<sup>1</sup> This deadline falls on Friday, July 4, 2025, which is a federal holiday. As a result, this deadline extends to the next court day, Monday, July 7, 2025, by operation of FRCP.

This request for an extension is made in good faith and joined by all the parties in this case. The Request is timely pursuant to LR 26-3. Trial is not yet set in this matter, and dispositive motions have not yet been filed. Accordingly, this extension will not delay this case. Since this request is a joint request, no party will be prejudiced. The extension will allow the parties the necessary time to complete discovery.

**IT IS SO STIPULATED AND AGREED.**

DATED this 5th day of February, 2025.

DATED this 5th day of February, 2025.

**LAGOMARSINO LAW**

**SF FIRM, LLP**

/s/ Taylor Jorgensen

/s/ Jacob Fannesbeck

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**IT IS SO ORDERED.**

By: 

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 2/6/2025

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